

PUBLIC UTILITIES COMMISSION

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June 4, 2018

Ryan Stevenson
Principal Advisor
Regulatory Affairs
Southern California Edison
8631 Rush St, General Office 4 – 235E (2nd Floor)
Rosemead, CA, 91770

RE: West of Devers Upgrade Project: Minor Project Refinement (MPR) #15

Dear Mr. Stevenson,

On May 31, 2018, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) #15 for paving the Poultry Material Yard access road and parking/staging area approved under the California Public Utilities Commission (CPUC) Notice to Proceed (NTP) #1, August 10, 2017, in support of the West of Devers Upgrade Project in Riverside County, California.

The CPUC voted on August 18, 2016 to approve SCE's West of Devers Upgrade Project (Decision D.16-08-017) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2014051041).

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Plan (MMCRP) to ensure compliance with all mitigation measures imposed on the West of Devers Upgrade Project during implementation. The MMCRP also acknowledges that temporary changes to the project, such as final project design and engineering or need for addition workspace, are anticipated and common practice for construction efforts of this scale and that a MPR request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this MPR, and that no new impacts or increase in impact severity would result from the requested MPR activities.

MPRs are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. MPRs do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

MPR #15 for paving the Poultry Material Yard access road and parking/staging area approved under NTP #1, is granted by CPUC based on the factors described below.

SCE MPR Request. Excerpts from the SCE MPR request, received May 31, 2018 is presented below (indented):

Approximately 46,000 square feet of asphalt pavement will be installed in a 3-inch thick layer along the Poultry Material Yard access road, inside the frontage area of the yard, to mitigate fugitive dust and track-out from entering upon the adjacent, parallel, and public San Timoteo Canyon Road. In addition, approximately 70,000 square feet of asphalt pavement will be installed in a 1.5 to 2-inch thick layer surrounding the Poultry Material Yard trailer complex, to further mitigate fugitive dust and track-out from exiting the property boundaries.

Because San Timoteo Canyon Road is a rural, high-speed, 2-lane highway, the existing rock ingress/egress to the material yard creates an unsafe condition for vehicles turning into the material yard and public travelers on the road. The unsafe condition will also be mitigated with the installation of the temporary paving, eliminating the potential for rock kick-back into the public roadway and sudden vehicle stalls over the boulders.

The asphalt paving will be removed upon completion of the project, when the site is restored to preconstruction conditions; therefore, no new temporary or permanent impacts are associated with this minor project refinement.

CPUC Evaluation of MPR Request

In accordance with the MMCRP, the subject MPR request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested MPR activities and that the subject request was within the geographic boundary of the Project study area. The following discussion summarizes this analysis for agriculture, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use, noise, paleontological resources, traffic and transportation, visual resources, water resources, and wildland fire. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures (MMs) and Applicant Proposed Measures (APMs) and are based on specific site conditions and/or are proposed conditions by SCE.

Agriculture: No Important Farmland will be impacted with the implementation of this MPR. The area to be temporarily paved is developed/disturbed land.

Air Quality: During proposed construction, SCE shall implement the Fugitive Dust Control Plan approved by the CPUC on May 22, 2017, as well as the Exhaust Emissions Control Plan approved by CPUC on June 8, 2017. In addition, in compliance with MM AQ-1b, off-road equipment with engines larger than 50 horsepower shall have engines that meet or exceed U.S. EPA/CARB Tier 3 Emissions Standards. No additional impacts to air quality will occur with the implementation of MPR.

Biological Resources: SCE submitted biological resource survey information with the MPR #15 request. The new work location was included in previous biological surveys for the Project. In addition, preconstruction clearance surveys were conducted for the development of the Poultry Material Yard on February 7, 2018. Since that survey, the yard has been developed extensively and is currently operating as an active construction material yard. Monitoring spot checks and nesting bird sweeps have been conducted and will continue to be conducted periodically during yard operation. The access road subject to paving has already been developed and graveled. Burrowing owl habitat (in the form of annual and perennial grasslands and scrublands characterized by low growing vegetation) is present within the survey buffer, but not along the access road or parking area. Burrowing owls often inhabit the margins along agricultural fields and development; therefore, burrowing owls have the potential to occur in the vicinity of the Poultry Yard. However, no burrowing owls or sign were observed during the preconstruction survey or subsequent biological sweeps of the area. Suitable substrates for nesting birds protected by the California Fish and Game Code and Migratory Bird Treaty Act, including trees, shrubs, man-made structures, and the ground surface, are located within the yard, trailer complex parking area, and the vicinity. No active nests were observed during the preconstruction survey, and no avian species were observed exhibiting behavior suggestive of breeding activity during subsequent biological sweeps of the access road or trailer complex parking area. Ongoing surveys and monitoring for nesting birds, will take place during the nesting season (January 1 – August 31). A jurisdictional drainage feature is mapped outside the southwest boundary of the yard, which does not intersect the access road or parking area, and will be avoided during paving construction. No additional impacts to biological resources are anticipated with the implementation of this MPR.

Cultural Resources: SCE submitted cultural resource information with the MPR #15 request. A Cultural Resources Management Plan (CRMP) has been completed for the West of Devers Upgrade Project and was approved by the CPUC in October 2017. The work areas are located within the Project Area of Potential Affect (APE) and were covered within the record search data that was conducted during previous surveys and studies (LSA 2012), as well as the Cultural pedestrian survey conducted for the WOD Material Yards in 2013 (LSA 2013). No cultural resources are recorded within 100 feet of the work area and no archaeological or Native American monitoring are required, per the CRMP. In the event of unanticipated discoveries, MM CL-1b, MM CL-1c, MM CL-1d and the CRMP requirements would be implemented. No impacts to cultural resources are anticipated with the implementation of this MPR.

Geology and Soils: SCE conducted geotechnical studies to evaluate faults, landslides and unstable slopes, and soil characteristics as outlined in MMs G-1a, G-2a, and G-5a. The geotechnical survey reports were reviewed and approved by the CPUC on August 17, 2017. No additional impacts to geology and soils will occur with the implementation of this MPR.

Hazards and Hazardous Materials: As required by MM HH-1a, SCE prepared and submitted a Hazardous Materials and Waste Management Plan to the CPUC on September 27, 2017. Hazardous materials used and stored on site for the duration of construction activities will be managed according to the Plan. A Soil Management Plan has been developed consistent with MMs HH-2a and HH-3a to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities, including soil samples to be collected in construction areas where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. SCE's Soil Management Plan was combined with the Hazardous Materials and Waste Management Plan described above. Also, SCE's contractor submitted information including written procedures for fueling and maintenance of construction equipment and an Emergency Response Plan. No additional impacts from hazards or hazardous materials will occur with the implementation of this MPR.

Land Use: As required by MM LU-1a, a Construction Notification Plan was prepared by SCE and approved by CPUC on May 22, 2017. The Plan identified the procedures to ensure that SCE will inform property and business owners of the location and duration of construction. The Plan includes provisions for public noticing including mailers, newspaper advertisements, public venue notices, and includes the establishment of a public liaison and toll-free information hotline. No additional impacts to land use will occur with the implementation of this MPR.

Noise: Best Management Practices for construction noise management will be implemented as outlined in MM N-1a to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction. Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule developed by SCE based on its coordination with local jurisdiction. Construction traffic shall be routed away from residences and schools, where feasible. No additional impacts to noise will occur with the implementation of this MPR.

Paleontological Resources: A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) has been completed for the West of Devers Upgrade Project and was approved by the CPUC on May 9, 2017. In the event of unanticipated discoveries, MM PAL-1d and the PRMMP requirements would be implemented. No ground disturbing activities are associated with this work; therefore, no additional impacts to paleontological resources will occur with implementation of this MPR.

Traffic and Transportation: Consistent with MM T-1a and MM T-1b, Construction Transportation and Traffic Control Plans have been developed and approved. The Construction Transportation Plan describes timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. No additional impacts to traffic and transportation will occur with the implementation of this MPR.

Visual Resources: The paving of access roads and staging areas described in this MPR is no different than what was described in NTP #1 and are temporary. No additional impacts to visual resources will occur with the implementation of this MPR.

Water Resources: As required by MM WR-2a, SCE developed and submitted an Erosion Control Plan to the CPUC and BLM. The Erosion Control Plan was incorporated into the Stormwater Pollution Prevention Plan (SWPPP), which will be kept onsite and readily available on request. SCE submitted the SWPPP to the CPUC on May 25, 2017. Any changes necessitated by this MPR will be incorporated into the SWPPP document. No additional impacts to water resources will occur with the implementation of this MPR.

Wildland Fire: SCE submitted a Fire Management Plan on February 10, 2017 to satisfy the conditions of MM WF-1a and the Plan was approved by the CPUC on July 18, 2017. This Fire Management Plan has been submitted to local fire departments. The areas to be paved are in disturbed/developed land. No additional impacts to wildland fire will occur with the implementation of this MPR.

The conditions noted below shall be met by SCE and its contractors:

- All applicable Project MMs, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this MPR shall be available on site for the duration of construction activities. All permits and plans shall be made available to the CPUC EM upon request.
- SCE will conduct pre-construction surveys prior to construction, including surveys for nesting birds from January 1 to August 31. If special-status resources are identified, SCE will implement the applicable mitigation measures and/or permit conditions, as determined in coordination with the CPUC, BLM, CDFW, USFWS, or other applicable regulatory agencies. In addition, a Biological Monitor will conduct spot check sweeps weekly thereafter.
- All crew members shall be WEAP trained prior to working on the Project. A log shall be maintained on-site with the names of all crew personnel trained. The WEAP training brochure can be provided in Spanish or other languages if appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a MPR request shall be submitted for CPUC review.

Sincerely,



Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen